
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Honorable Edward S. Kiel
 :
 : Mag. No. 20-15141
 v. :
 : **CRIMINAL COMPLAINT**
 RAHEEM JACKSON :

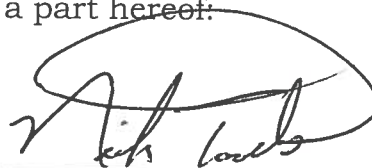
I, Nicolae C. Toader, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Task Force Officer with the Federal Bureau of Investigation ("FBI") and that this complaint is based on the following facts:

SEE ATTACHMENT B

Continued on the attached page and made a part hereof:



Nicolae C. Toader, Task Force Officer
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence on this 13th day of March, 2020 in Newark, New Jersey

HONORABLE EDWARD S. KIEL
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer

ATTACHMENT B

I, Nicolae C. Toader, am a Task Force Officer with the Federal Bureau of Investigation. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and photographs of the evidence. Where statements of others are related herein, they are related in substance and part. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. On or about December 7, 2007, defendant RAHEEM JACKSON ("JACKSON") was convicted in the Superior Court of New Jersey, Passaic County, for burglary, an offense punishable by a term of imprisonment of more than one year.

2. On January 5, 2020 at approximately 12:10 a.m., a shot spotter gunshot detection system in Newark detected one gunshot in the area of 718 Springfield Avenue. Newark Police officers responded to the area and found on the ground a 9-millimeter Taurus Model G2 handgun, with a defaced serial number (the "Firearm"), which was loaded with five rounds of ammunition. Officers also found one spent 9-millimeter shell casing on the ground nearby.

3. During their investigation, officers also recovered a video from a surveillance camera which was stationed in the area of the shooting. The videotape shows an individual – who was wearing a distinctive black jacket with multiple patches on it – appear to shoot a handgun and shortly thereafter bend down and place it on the ground at the same location that the officers found the Firearm.

4. On January 29, 2020, an officer observed what appeared to be the same male who had shot the firearm on January 5, 2020. The individual was standing in the same area where the shooting had occurred, and was wearing the same distinctive black jacket with multiple patches on it. Shortly thereafter, several officers responded to the scene and took defendant RAHEEM JACKSON into custody for questioning at police headquarters.

5. At police headquarters, defendant RAHEEM JACKSON waived his Miranda rights and agreed to speak to police. He then admitted that he was at the location of the shooting on January 5, 2020 and that he had shot the Firearm into the air on January 5, 2020 while wearing the black jacket with multiple patches.

6. The Firearm was manufactured outside the State of New Jersey. Additionally, the 9-millimeter shell casings ejected from the firearm was manufactured by Smith & Wesson, which is manufactured outside the State of the New Jersey. Therefore, the firearm and ammunition used here necessarily had to move in interstate commerce prior to January 5, 2020.